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United States of America
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FILED
Oct 25, 2021
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SEALED

8 IN THE UNITED STATES DISTRICT COURT
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EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA

CASE NO. 1:21-mj-00114-BAM

11 Plaintiff,

12
SEALING APPLICATION; [PROPOSED]
SEALING ORDER

BAM

13 v.
14 RANDALL MCKINNEY,

15 Defendant.

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17 The United States applies to this Court for an order permitting it to file the complaint, arrest
18 warrant, and related sealing documents in the above-captioned case under seal until further order of the
19 Court. The Ninth Circuit has held that federal district courts have the inherent power to seal documents
20 in appropriate circumstances. *Offices of Lakeside Non-Ferrous Metals, Inc. v. United States*,
21 679 F.2d 779 (9th Cir. 1982); *State of Arizona v. Maypenny*, 672 F.2d 761, 765 (9th Cir. 1982); *United*
22 *States v. Agosto*, 600 F.2d 1256 (9th Cir. 1979). In this case, the complaint and arrest warrant pertain to
23 an ongoing investigation that is neither public nor fully known to the target of the investigation.
24 Accordingly, there is good cause to seal the complaint, arrest warrant, and related sealing documents
25 because premature disclosure may jeopardize the investigation and cause the target to flee from justice,
26 destroy evidence, or tamper with witnesses.

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Respectfully submitted
PHILLIP A. TALBET
Acting United States Attorney

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By

5
/s/ Joseph Barton

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JOSPEH BARTON
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Assistant United States Attorney

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Dated: _____
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9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA

CASE NO.

12 Plaintiff,

[PROPOSED] SEALING ORDER

13 v.

14 RANDALL MCKINNEY,

15 Defendant.

18 **O R D E R**

19 Upon Application of the United States and good cause having been shown, IT IS HEREBY
20 ORDERED that the complaint, arrest warrant, and related sealing documents in the above-captioned
21 case be SEALED until further order of this Court

22
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24 Dated: 10/22/21


25 HON. BARBARA A. MCAULIFFE
26 Unites States Magistrate Judge
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